

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
AIKEN DIVISION**

Alisha Johnson, ) Case No. 1:24-cv-02612-JDA-PJG  
 )  
 Plaintiff, )  
 )  
 v. ) **JOINT MOTION TO AMEND  
 SCHEDULING ORDER**  
 )  
 Savannah River Nuclear Solutions, )  
 )  
 Defendant. )  
 )  
 )

---

COMES NOW Defendant Savannah River Nuclear Solutions (“Defendant”), with the consent of Plaintiff Alisha Johnson (“Plaintiff”), by and through their undersigned counsel, pursuant to Fed. R. Civ. P. 6(b)(1) and Local Civil Rules 6.01 and 7.02 (D.S.C.), hereby request that the Amended Scheduling Order (ECF No. 28) entered on March 19, 2025, be amended. As grounds for this Motion, counsel would show the following:

1. The Parties are working diligently to meet the deadlines set by the Court in this matter. The Parties have exchanged written discovery and responded to those requests. Defendant deposed Plaintiff on January 8, 2025, and several other depositions are scheduled for April 23, 2025. However, due to unforeseen circumstances, the Parties need more time to complete additional depositions.

2. Two keys witness were scheduled to be deposed on April 14, 2025. However, counsel for Defendant now has a court hearing scheduled that same day. The parties have agreed to reschedule these two depositions for May 6, 2025.

3. Discovery in this matter is currently set to end on May 5, 2025.

4. The Parties continue to work cooperatively to pursue discovery in this matter, but need additional time to take the already scheduled depositions of these two witnesses.

Accordingly, the Parties request that all remaining deadlines in the Amended Scheduling Order dated March 19, 2025, be extended approximately seven (7) days as set forth in the proposed Amended Scheduling Order filed herewith. The Parties have consulted and agreed on this motion and make this motion for good cause and not for the purpose of delay. This is the Parties' fourth request to extend the Scheduling Order since the Rule 26(f) conference; however, the Parties do not anticipate the need to seek further extension of discovery as the parties have already agreed on a date for depositions.

WHEREFORE, the Parties respectfully request that the Court issue an Amended Scheduling Order to extend the deadlines as requested. A proposed Amended Scheduling Order is being submitted contemporaneously via electronic mail.

**WE SO MOVE.**

s/ Julius W. Babb IV  
Julius W. Babb, IV (Fed. ID No. 10500)  
1418 Laurel Street, Suite A  
Post Office Box 11675  
Columbia, SC 29211  
T: 803-799-9530  
F: 803-799-9533  
[Jay@cromerbabb.com](mailto:Jay@cromerbabb.com)

ATTORNEY FOR PLAINTIFF

s/ Phillips L. McWilliams  
Phillips L. McWilliams (Fed. ID No. 11992)  
[pmcwilliams@fisherphillips.com](mailto:pmcwilliams@fisherphillips.com)  
Erin W. Anderson (Fed. ID No. 13376)  
[eanderson@fisherphillips.com](mailto:eanderson@fisherphillips.com)  
1320 Main Street, Suite 750  
Columbia, South Carolina 29201  
T: (803) 255-0000  
F: (803) 255-0202

ATTORNEYS FOR DEFENDANT  
SAVANNAH RIVER NUCLEAR  
SOLUTIONS

Dated this 15<sup>th</sup> day of April, 2025